

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CRIMINAL ACTION NO.
1:09-cr-00110-WHP

UNITED STATES OF AMERICA

v.

DAVID EDUARDO HELMUT MURCIA
GUZMAN, ET AL.,

Defendants.

**VERIFIED CLAIM OF
HAMPTON SOUTH CONDOMINIUM ASSOCIATION, INC.**

Comes now, HAMPTON SOUTH CONDOMINIUM ASSOCIATION, INC. ("ASSOCIATION"), by and through its undersigned counsel and pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure and 21 U.S.C. § 853(n), hereby files this its Verified Claim to the Consent Order of Forfeiture in the above-styled action, and states in support thereof as follows:

1. The ASSOCIATION is a non-profit corporation duly organized under the laws of the State of Florida. Its Declaration of Condominium Establishing Hamptons South Condominium Association Inc., A Condominium, and Articles of Incorporation were recorded March 16, 2004, in Official Records Book 22124, at Page 1785, of the Public Records of Miami-Dade County, Florida.

2. LIFE STYLE MEDIA GROUP, LLC ("OWNER") was, at all relevant times, the owner of the following described real property located in Miami-Dade County, Florida:

Real property located at 20201 E. Country Club Drive, #902, Aventura, Florida 33180 more particularly described as:

Unit 902 of Hamptons South Condominium a Condominium according to the Declaration of Condominium thereof, as recorded in Official Records Book 22124, at Page 1785 of the Public Records of Miami-Dade County, Florida.

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Assessor's Parcel No.:28-1235-085-0330.

3. OWNER purchased said property subject to the conditions, limitations, terms and covenants of the ASSOCIATION.

4. THE RECORD OWNER of the above-described real property is LIFE STYLE MEDIA GROUP, LLC, by virtue of that certain Warrant Deed recorded on May 2, 2008 in the public records of Miami-Dade County, Florida, in Official Records Book 26357, at Page 4555.

5. OWNER has failed to pay assessments on said property from July, 2009 to the filing of this Claim. There is now due and owing:

Assessments through March, 2011	\$32,488.54
Interest 07/2009 – 3/2011	\$ 4,251.81
Interest special assessments 01/2010 – 03/2011	\$ 2,277.60
Costs	\$ 60.00
Attorneys' Fees	\$ 842.50
Attorneys' Fees (McCarter & English, LLP)	\$ 675.00
TOTAL	\$40,595.45

6. The ASSOCIATION has hired the law firms of SIEGFRIED, RIVERA, LERNER, DE LA TORRE & SOBEL, P.A. and MCCARTER & ENGLISH, LLP to represent its interests in the foregoing action.

WHEREFORE, HAMPTONS SOUTH CONDOMINIUM ASSOCIATION, INC. respectfully requests that this Court include its claim and adjudicate its rights in Plaintiff's forfeiture action, and that thereafter, the property be disposed of according to law, and for such other and further relief as the Court deems just and proper.

McCarter & English, LLP

By: 

Robert S. Bernstein
Attorneys for
Hampton South Condominium
Association, Inc.
245 Park Avenue
New York, New York 10167

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ACKNOWLEDGMENT

STATE OF NEW YORK)
) SS
COUNTY OF)

BEFORE ME, an officer duly authorized under the laws of the State of New York to administer oaths and take acknowledgements, personally appeared Robert Bernstein, personally known to me and known to be the individual described, and who executed the foregoing on behalf of the above-named HAMPTON SOUTH CONDOMINIUM ASSOCIATION, INC., a Florida corporation, and acknowledges to and before me that s/he executed said document.

WITNESS my hand and official seal this 17th day of ~~February~~ ^{March}, 2011.



NOTARY PUBLIC, State of New York

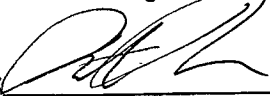
My Commission Expires:

MABEL TORRES
Notary Public, State of New York
No. 01T06174867
Qualified in Kings County
Commission Expires October 1, 2011

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Clerk of the Court this 17th day of ~~February~~ ^{March}, 2011, and served upon all counsel appearing in the captioned action in accordance with the Federal Rules of Civil Procedure and/or the Southern District's Rule on Electronic Service.

McCarter & English, LLP

By: 

Robert S. Bernstein

Attorneys for
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245 Park Avenue
New York, New York 10167